

September 6, 2016

Attn: Harbor Comments
U.S. Environmental Protection Agency
805 SW Broadway, Suite 500
Portland, OR 97205



PORTLAND FREIGHT COMMITTEE

To Whom It May Concern:

The Portland Freight Committee (PFC) consists of over 30 members including logistic service providers, shippers, trade associations and various businesses related to multimodal freight activities. The PFC has served as an advisory group on freight mobility issues to the city of Portland since 2003 and our mission is to support and enhance Portland's economy by advancing a balanced and well managed multimodal freight network.

The PFC supports cleaning up the Portland Harbor Superfund site to protect public health and the environment but in a way that is mindful of the impacts on the economy and quality middle-income jobs. We urge that the project be sensitive of the time required to clean up the site and the opportunity cost of foregone business activity, especially given recent infrastructure investments in the Portland Harbor to accommodate future growth. The proposed cleanup will not only impact businesses in the Portland Harbor but the broader Portland-metro region and state due to the economic linkages of vendors and suppliers that are part of the supply chain of marine industrial businesses.

Local taxpayers and ratepayers will also be impacted, including the city of Portland, and utilities because they are potentially responsible parties. In regards to the proposed plan:

- We are concerned about the accuracy of the proposed \$746 million cost estimate and would like to ensure that a more realistic project cost is put forward to avoid uncertainty. The EPA has underestimated past Superfund cleanups throughout the country and we want to avoid unexpected costs in the future.
- We are also concerned that the proposed cleanup would apply a one-size fits all approach despite the fact that there are different levels of contamination and risk throughout the Portland Harbor. A more cost-efficient and timely proposal would take a more phased approach that tailor cleanup remedies based on the varying levels of contamination and risk at different sites and river locations in the Portland Harbor. This would have the added benefit of implementing cleanup efforts sooner at those sites. Not all areas of the Portland Harbor require the same cleanup measures to achieve the same degree of cleanliness.

The cleanup of the Superfund site in the Portland Harbor is largely based on activities that took place over the past 70 years that also include the extensive ship building activities resulting from WWII. Its cleanup is long overdue and should be done in a way that protects our public health, the environment, local businesses and middle-income jobs. Thank you for the opportunity to comment.

Sincerely,

Pia Welch
Chair

Raihana Ansary
Vice Chair